

December 31, 2020

Mr. David Albright
Drinking Water Protection Section (WTR 4-2)
Environmental Protection Agency, Region 9
75 Hawthorne St
San Francisco, CA 94105

Subject: Thirty-day report following notification of AL Exceedance of Radon at M60-O
Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1

Dear Mr. Albright:

Florence Copper is providing this 30-Day Report for an alert level (AL) exceedance for radon at monitoring well M60-O under Underground Injection Control (UIC) Permit R9UIC-AZ3FY11 (Permit) under Parts II.H.2.a.iv.

On October 29, 2020, Florence Copper became aware of a potential AL exceedance for radon at monitoring well M60-O from a sample collected on October 8, 2020. The laboratory result for this sample was 2971.5 ± 298.2 pCi/L. The AL for radon is 2480 pCi/L for this well. As outlined in Part II.H.2.a.ii. of the Permit, Florence Copper notified EPA Region 9 on December 2, 2020 that the verification sample collected on November 5, 2020 and received on December 1, 2020 confirmed the AL exceedance with a radon result of 3015.8 ± 302.5 pCi/L.

One prior potential exceedance for radon at M60-O was reported to Region 9 on January 6, 2020 when a lab report from a sample collected on November 13, 2019 returned a value of $2,999.1 \pm 300.7$ pCi/L. A verification sample collected on December 17, 2019 returned a value of 2048.4 ± 205.8 pCi/L, below the AL.

As required by Part II.H.2.a.iv., Florence Copper is submitting this written report within thirty (30) days providing an evaluation of the cause, impacts, and mitigation of the AL exceedance.

Following verification of the exceedance, Florence Copper initiated an investigation into the cause of the AL exceedance. No malfunction or failure of pollution control devices or other equipment or processes occurred that contributed to the alert level exceedance.

Hydraulic control on the south side of the wellfield has been maintained as required by the permit throughout operation of the PTF and continues today.

No parameters that are indicative of the solutions injected into the wellfield (i.e., pH, conductivity, sulfate) are showing elevated concentrations in this well's water quality. The exceedance does not appear to be related to solutions migrating from the wellfield.

A video log was run on M60-O in November, which showed a relatively clean casing and screen. Following the video log, the well was redeveloped by airlifting. The well is scheduled to be re-sampled on January 6th, 2021.

Please feel free to contact me should you have any questions or comments.

Sincerely,

Florence Copper, Inc.

Jennifer Saran

For Brent Berg

Brent Berg
General Manager

Cc: Nancy Rumrill, EPA Region 9
Maribeth Greenslade, ADEQ